

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

BRIGHT DATA LTD.,

Plaintiff,

v.

TESO LT, UAB, Oxysales, UAB, and
Metacluster LT, UAB,

Defendants.

Case No. 2:19-CV-00395-JRG

JOINT MOTION TO EXTEND MEDIATION DEADLINE

Pursuant to the November 17, 2021 Order (“Order,” Dkt. 528) entered in this case, Plaintiff Bright Data Ltd. and Defendants Teso LT, UAB, Oxysales, UAB, and Metacluster LT, UAB (collectively, the “Parties”) have until January 3, 2022 to mediate this case before the Hon. David Folsom. Following issuance of the Order, the Parties promptly contacted Judge Folsom for his availability to mediate this case, but were informed that Judge Folsom’s December calendar is full and that the first available date for mediation is on January 6, 2022. The Parties have confirmed their ability to hold the mediation on that date. In order to accommodate the schedule of Judge Folsom, the Parties respectfully request that the mediation deadline be extended to January 10, 2022.

Dated: December 3, 2021

Respectfully submitted,

/s/ Ronald Wielkopolski

J. MARK MANN

Texas State Bar No. 12926150

mark@themannfirm.com

G. BLAKE THOMPSON

Texas State Bar No. 24042033
blake@themannfirm.com
MANN | TINDEL | THOMPSON
300 West Main Street
Henderson, Texas 75652
Telephone: (903) 657-8540
Telecopier: (903) 657-6003

KORULA T. CHERIAN
sunnyc@ruyakcherian.com
ROBERT HARKINS
bobh@ruyakcherian.com
RUYAKCHERIAN LLP
1936 University Avenue, Suite 350
Berkeley, California 94702
Telephone: (510) 944-0192

RONALD WIELKOPOLSKI
ronw@ruyakcherian.com
RUYAKCHERIAN LLP
1901 L Street, NW, Suite 700
Washington, DC 20036
Telephone: (202) 838-1560

S. CALVIN CAPSHAW
Texas State Bar No. 03783900
ccapshaw@capshawlaw.com
ELIZABETH L. DERIEUX
Texas State Bar No. 05770585
ederieux@capshawlaw.com
CAPSHAW DERIEUX, LLP
114 E. Commerce Avenue
Gladewater, Texas 75647
Telephone: (903) 845-5770

Counsel for Bright Data, Ltd.

Dated: December 3, 2021

BRETT C. GOVETT
Texas State Bar No. 08235900
brett.govett@nortonrosefulbright.com

Respectfully submitted,

/s/ Steven Callahan
MICHAEL C. SMITH
Texas State Bar No. 18650410
michael.smith@solidcounsel.com
SCHEEF & STONE, LLP

NORTON ROSE FULBRIGHT US LLP
2200 Ross Avenue, Suite 3600
Dallas, Texas 75201
Telephone: (214) 855-8000
Telecopier: (214) 855-8200

DANIEL S. LEVENTHAL
Texas State Bar No. 24050923
daniel.leventhal@nortonrosefulbright.com
NORTON ROSE FULBRIGHT US LLP
1301 McKinney, Suite 5100
Houston, Texas 77010-3095
Telephone: (713) 651-5151
Telecopier: (713) 651-5246

113 East Austin Street
Marshall, Texas 75670
Telephone: (903) 938-8900
Telecopier: (972) 767-4620

STEVEN CALLAHAN
Texas State Bar No. 24053122
scallahan@ccrglaw.com

CRAIG TOLLIVER
Texas State Bar No. 24028049
ctolliver@ccrglaw.com

GEORGE T. "JORDE" SCOTT
Texas State Bar No. 24061276
jscott@ccrglaw.com

MITCHELL SIBLEY
Texas State Bar No. 24073097
msibley@ccrglaw.com

JOHN HEUTON
Admitted *Pro Hac Vice*
jheuton@ccrglaw.com

CHARHON CALLAHAN
ROBSON & GARZA, PLLC
3333 Lee Parkway, Suite 460
Dallas, Texas 75219
Telephone: (214) 521-6400
Telecopier: (214) 764-8392

*Counsel for Defendants Teso LT, UAB,
Oxysales, UAB and Metaccluster LT, UAB*

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5(a) on December 3, 2021. As such, this document was served on all counsel who are deemed to have consented to electronic service. Local Rule CV-5(a)(3)(A).

/s/ Ronald Wielkopolski

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that the counsels for the parties have complied with Local Rule CV-7(h). Counsel participating include: Robert Harkins, Ronald Wielkopolski, Betty DeRieux, Mark Mann, and Blake Thompson on behalf of Plaintiff; Steven Callahan and Becca Skupin on behalf of Defendants. The parties reached agreement during a telephonic meet and confer on November 30, 2021. Defendants join this motion.

/s/ Ronald Wielkopolski